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13 **IN THE UNITED STATES DISTRICT COURT**  
14 **FOR THE DISTRICT OF NEVADA**

15 ROBERT SINGER,

16 Plaintiff,

17 v.

18 C. R. BARD, INC.; BARD PERIPHERAL  
19 VASCULAR, INCORPORATED,

20 Defendants.  
21

CASE NO. 2:19-cv-01579-JCM-BNW

**STIPULATION TO AMEND  
SCHEDULING ORDER**

22 Plaintiff Robert Singer (“Plaintiff”) and Defendants C. R. Bard, Inc. and Bard Peripheral  
23 Vascular, Inc. (“Defendants” and collectively with Plaintiff, the “Parties”), pursuant to Fed. R. Civ. P.  
24 26(c) and (d) and LR IA 6-2, respectfully request that this Court amend its Order Granting Stipulation  
25 for Extension of Time, Dkt. 42 (“Scheduling Order”), as set forth below.

26 In June 2021, the Parties engaged in mediation in an attempt to resolve this case and those of six  
27 other plaintiffs represented by Plaintiff’s counsel. Pending mediation, this case was stayed and the Parties  
28 refrained from conducting discovery. Mediation was unsuccessful, and the Parties must now resume and

complete additional fact discovery. The Parties therefore stipulate and request that this Court amend the pretrial discovery deadlines set forth in the Scheduling Order, Dkt. 42, as follows (requested modifications are **bolded**):

PROPOSED DATE	DEADLINE
<b>October 19, 2021</b>	Case-specific fact discovery closes <del>with the exception of depositions of Plaintiff's disclosed family and friend witnesses and Defendants' applicable territory and district managers (which shall be taken no later than 30 days before trial is scheduled to begin).</del>
<b>November 2, 2021</b>	The Plaintiff shall produce case-specific expert reports.
<b>December 8, 2021</b>	The Defendants shall produce case-specific expert reports.
<b>December 28, 2021</b>	The Plaintiff shall produce any case-specific rebuttal expert reports.
<b>January 24, 2022</b>	The Defendants shall produce any rebuttal expert reports.
<b>February 3, 2022</b>	Deadline to depose the Plaintiff's case-specific experts.
<b>March 10, 2022</b>	Deadline to depose the Defendants' case-specific experts.
<b>April 21, 2022</b>	Deadline to file Daubert motions and other dispositive motions.

**IT IS SO STIPULATED.**

Dated this 1st day of July 2021.

WETHERALL GROUP, LTD.

GREENBERG TRAURIG, LLP

By: /s/ Peter C. Wetherall

By: /s/ Eric W. Swanis

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**IT IS SO ORDERED.**



BRENDA WEKSLER  
United States Magistrate Judge

Dated July 6, 2021.